

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

IN RE:	§	
	§	
MCCLAIN FEED YARD, INC., ET AL¹	§	CASE NO. 23-20084-RLJ-7
	§	
DEBTORS.	§	Jointly Administered

AFFIDAVIT OF KEN SIBLEY

STATE OF TEXAS	§	
	§	
COUNTY OF DALLAS	§	

ON THIS DAY appeared Ken Sibley who, upon being duly sworn, did attest to the following:

1. “My name is Ken Sibley, I am over the age of 18 years, and am competent and otherwise qualified to make this Affidavit. I have personal knowledge of the matters stated herein and they are all true and correct to the best of my knowledge.

2. “I am a CPA with the accounting firm of Sibley LLC (“Sibley LLC”). Sibley LLC maintains offices at 400 N. Saint Paul Street, Suite 600, Dallas, Texas 75201.

3. “This Affidavit is being provided in connection with the Motion for Approval of Employment of Accounting Expert for Trustee (the “Application”), filed by Kent Reis (the “Trustee”), the duly-appointed Chapter 7 trustee of the Debtors’ estate, in the above-referenced case, and pursuant to 11 U.S.C. § 327(a) and Fed. R. Bankr. P. 2014(a). I have read the Application and believe all of the matters asserted therein to be true and correct.

¹ The Debtors in these Chapter 7 cases are: McClain Feed Yard, Inc. (Case No. 23-20084-RLJ), McClain Farms, Inc. (Case No. 23-20085-RLJ), and 7M Cattle Feeders, Inc. (Case No. 23-20086-RLJ)

4. “Sibley LLC maintains an office in Dallas, Texas. Sibley LLC is currently comprised of approximately one accountant and support staff. Sibley LLC has expertise in many areas of accounting including business reorganization, bankruptcy, forensic accounting, and claims administration.

5. “The Trustee has requested that Sibley LLC render professional services at the direction of the Trustee in connection with these Chapter 7 cases. The professional services, pursuant to 11 U.S.C. §327, that the Trustee requires or may need Sibley LLC to render include, but are not limited to, provide expertise and consultation regarding the pre-petition accounting services provided to the Debtors, investigating records and information of the Debtors, and investigating and pursuing litigation claims of the Debtors’ bankruptcy estates.

6. “The above described professional services will be performed in a consultant role. Should it be determined at a later date that the Trustee requires expert witness services in this matter and desires Sibley LLC to provide those services, this Application will be amended to address those additional services.

7. “Subject to court approval of the Application, Sibley LLC is willing to serve as the Trustee’s accountants and to perform the services described above.

8. “Sibley LLC has agreed to perform such accounting services on an hourly fee basis at its standard hourly rates, and the Trustee has agreed to same subject to this Court’s approval. Sibley LLC’s standard rates range from the following, depending on the personnel assigned:

Professional	Hourly Rate
Ken Sibley	\$650.00
Support Staff	\$255.00 to \$600.00

9. “Sibley LLC’s rates are subject to periodic adjustment (normally at year end) to reflect economic conditions, as well as experience and other similar factors.

10. “Sibley LLC has not received any promise as to compensation in connection with the representation other than as set out above.

11. “As part of its diverse practice, Sibley LLC is involved in numerous proceedings and transactions that involve many different professionals, including attorneys, brokers, and financial consultants, who may represent claimants and parties in interest in the Debtors’ chapter 7 cases. Also, Sibley LLC has performed in the past, and may perform in the future, services for various attorneys and law firms, and has been represented by several attorneys and law firms, some of whom may be involved in this proceeding. Sibley LLC has previously worked, may currently work, and will likely in the future be working with or against other professionals involved in this case in matters unrelated to the Debtors and these cases. Based on our current knowledge of the professionals involved, and to the best of my knowledge, none of these relationships create interests materially adverse to the Debtors in matters upon which Sibley LLC is to be employed, and none are in connection with these cases.

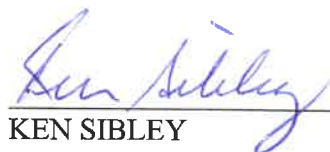
12. “I have reviewed the Conflict List attached hereto. I am not aware of any prior or current representation by Sibley LLC of any of these parties. Accordingly, to the best of my knowledge, the members of Sibley LLC (i) do not have any connection with the Debtors, their creditors, or any other party in interest or their respective attorneys and accountants, (ii) do not have any connection with the United States Trustee or any person employed by the Office of the United States Trustee, (iii) are ‘disinterested persons,’ as defined in § 101(14) of the Bankruptcy Code, and (iv) do not hold or represent any interest adverse to the Debtors’ estates.

13. “In preparing this Affidavit, I have reviewed, or caused to be reviewed, the records of Sibley LLC to determine whether Sibley LLC has any connections with the known parties in interest in this case, or any of their known attorneys and accountants.

14. “Based on the foregoing, I believe Sibley LLC and its members to be “disinterested persons” for purposes of § 101(14) of the Bankruptcy Code. To the extent that Sibley LLC discovers any facts bearing upon the matters described herein or its engagement by the Trustee, Sibley LLC will promptly supplement the information contained in this Affidavit to disclose such information.


15. “Accordingly, to the best of my knowledge, Sibley LLC is qualified to serve as an expert for the Chapter 7 Trustee in these Chapter 7 cases.”

FURTHER AFFIANT SAYETH NOT.


KEN SIBLEY

SWORN TO AND SUBSCRIBED BEFORE ME on this 16th day of April 2025, to certify which witness my hand and seal of office.




NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS

CONFLICT LIST

Carr, Riggs, Ingram
Mechanics Bank
Community Financial
Services Bank
HTLF Bank
First Bank in Trust
Brian McClain
Rabo AgriFinance
Mechanics Bank
MAP Enterprises
Wild Horse Cattle Co.
(Kentucky entities)
Community First Bank in
Kentucky
2B Farms
AJ Jacques Living Trust
Arnold Braun
Arnold Braun Trust
Dr. Arnold Braun
Buss Family Trust
Caterpillar Financial
Services Corporation
First Kentucky Bank
Gene Brookshire Family,
LP
Gray Brothers
Gungoll Cattle LLC
Jordan Lesh, LLC
Lesh Family Trust
Morrison Café LLC
Northland Capital
Financial Services LLC
Scarlet and Black Cattle
LLC
Scott Livestock Company
Inc.
Steve T. Scott Farms, Inc.
W. Robbie Russell Living
Trust
Acey Livestock LLC
Ag Texas Farm Credit
Services
AgTexas, PCA
Angela Powell

Bar D Ranch Land &
Cattle LLC
Big Seven Capital Partners
LLC
Bo Robinson
Bryan Blackman
C Heart Ranch LLC
Cactus Feeders Finance
LLC
Cactus Operating LLC
Caleb Little
Carl Pickett
Carraway Cattle
Chelsea Waters McClain
Kentucky Department of
Agriculture
Cody L. Simmons
Colton Long
Community Financial
Services Bank
Cory Don Priest
Crystal McClain
Curtis Jones
Curtis Jones Farms LLC
David Rainey
Death Creek Farms LLC
Don Jones
Don Jones Farm Inc.
Don Jones Trucking Inc.
Douglas Pritchett
Dwight Jesko
Eric Dejarnatt
First Capital Bank of
Texas
First Kentucky Bank
Friona Industries, L.P.
Frontier Farm Credit
Garwood Cattle Company
LLC
Hines Cattle Company
LLC
Hines Farms LLC
J. Brent Burnett
Jake Rininger

Jared Lesh Cowhorses Inc.
Jared Wayne Lesh
Jed Goad
JLE Trucking, Inc.
Jimmy D. Greer
John Dale Tidwell
Jordan Robert Lesh
Jordan and Jan Lesh
Julie Whitlock
Justin Stuever
Keeling Cattle Feeders,
Inc.
Keith Harris Farms, Inc.
Kenneth Netardus
Kinsey Jones
Lazy J Arena, LLC
Lazy J Cattle
Lesh Family Trust
Lesh Trucking
Lyndal Van Buskirk
Meagan B. Goad
Meagan B. Powell
Michael Gourley
Mykel Linn Tidwell
Oklahoma AgCredit
Open A Arena LLC
Patty Priest
Priest Cattle Company,
Ltd.
Priest Cattle and Land
Company, Inc.
Priest Victory Investment
LLC
Producers Credit
Corporation
Rapp Ranch
Rick Rodgers
Riley Livestock
Robert Braun
Samuel S. Brown
Shaw & Shaw Farms
Partnership, LLC
Sherman Trucking
Stanley Ayers

TGF Ranch
Takeuchi Financial
Services
Terry Burnett
Thorlakson Feedyards
Tom Thorlakson
WJ Performance Horses,
Inc.
Wildforest Cattle
Company LLC
Amy Sutton
Charles Lockwood
Colby Van Buskirk
Cole Lockwood
Craig Sutton

Don Hines
Dennis Buss
Dora Blackman
Douglas Finley
Dustin Johnson
Eddie Bryant
Eddie Stewart
Gary Lesh
Janet Van Buskirk
Janice Lawhon
Joel Brookshire
Leah Gungoll
Michael Evans
Miranda Evans
Nikki Lockwood

Robert Spring
Robert Gray
Robert & Rachel Steward
Ronnie Gray
Sherle Lockwood
Steve Ryan
Steven Hines
Susan Van Buskirk
Wiley Russell, Jr.
Wiley Roby Russell, Jr.
BJM Sales & Service
Heartland Co-Op
Purina Animal Nutrition
LLC